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Attorney for Defendant  
JEFFREY PATRICK QUINLAN

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, ) Cr. No. 00-00485 DAE  
                                )  
Plaintiff,                 ) MOTION FOR EARLY  
                                ) TERMINATION OF SUPERVISED  
vs.                         ) RELEASE; EXHIBITS A-B;  
                               ) CERTIFICATE OF SERVICE  
JEFFREY PATRICK QUINLAN, )  
                               )  
Defendant.                 )  
                               )  
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**MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE**

COMES NOW the defendant, JEFFREY PATRICK QUINLAN,  
through counsel, Loretta A. Faymonville, Assistant Federal Defender, and moves

this Honorable Court to terminate his supervised release, and in support of this motion states as follows:

(1) Jeffrey Quinlan suffers from a chronic and debilitating mental condition. In May, 2000, he was homeless and felt that he could not take care of himself. His solution was to rob a bank so that he would be incarcerated. He did so and passed out money to people on the street while waiting for the police to arrive to arrest him.

(2) Mr. Quinlan was sent to the Federal Medical Center in Springfield, Missouri, for a competency evaluation. While there he was given anti psychotic and mood stabilizing medications. He took these medications willingly and expressed his desire to keep taking the medications.

(3) With his mental illness in remission, Mr. Quinlan was returned to court, where he plead guilty as charged.

(4) On May 16, 2001, this court sentenced Mr. Quinlan to 48 months of incarceration, to be followed by three years of supervised release. Two and one half to three years of the supervised release were ordered to be served in a halfway house.

(5) Mr. Quinlan was released from custody and began his period of supervised release on October 31, 2003. He was sent to Miller Hale, which was

not a good placement for someone who is mentally ill. At his own request, Mr. Quinlan went back into federal custody pending the availability of suitable placement.

(6) Subsequently, Mr. Quinlan was released to the Po'ailani dual diagnosis treatment program. He successfully completed the program, as well as the aftercare program in November, 2004.

(7) Mr. Quinlan was then transferred to a lower level of care. In a letter written on February 11, 2005, and attached hereto as Exhibit A, his caseworker indicated that he was doing extremely well. He recommended that Mr. Quinlan stay in that program for six more months, before a transfer to independent living.

(8) In a letter dated May 2, 2005, and attached hereto as Exhibit B, the same caseworker states that Mr. Quinlan is doing extremely well and that he supports Mr. Quinlan's early release from probation.

(9) Mr. Quinlan has now successfully completed two and one half years of supervised release, the vast majority of which time he has been in treatment programs and halfway houses as ordered by this court.

(10) Mr. Quinlan has no immediate plans to leave his current placement. He is asking, however, for this court to give him a vote of confidence,

a showing that Your Honor believes that he will continue on the right path without the necessity of continued supervision.

Based upon the foregoing, it is respectfully requested that This Honorable Court grant Mr. Quinlan early termination of his supervised release.

DATED: Honolulu, Hawaii, May 5, 2006.

/s/ Loretta A. Faymonville  
LORETTA A. FAYMONVILLE  
Attorney for Defendant  
JEFFREY PATRICK QUINLAN

**CERTIFICATE OF SERVICE**

LORETTA A. FAYMONVILLE, hereby certifies that on the date and by the method of service noted below, a true and correct copy of the foregoing was served on the following at the last known address on May 5, 2006:

EDRIC CHING (Served Electronically through CM/ECF)  
Assistant United States Attorney  
Attorney for Plaintiff  
UNITED STATES OF AMERICA

LISA JICHA (via hand-delivery)  
U. S. Probation Officer  
U. S. Probation Office  
300 Ala Moana Boulevard, Room C110  
Honolulu, Hawaii 96850

DATED: Honolulu, Hawaii, May 5, 2006.

/s/ Loretta A. Faymonville  
LORETTA A. FAYMONVILLE  
Attorney for Defendant  
JEFFREY PATRICK QUINLAN